IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

J. DOE 4 et al., individually and on behalf of all others similarly situated,

Plaintiffs,

Case No. 8:25-cv-00462-TDC

v.

ELON MUSK et al.,

Defendants.

CONSENT MOTION FOR MODIFICATION OF SCHEDULING ORDER

The parties respectfully move for this Court to grant their Consent Motion for Modification of Scheduling Order, and in support show the following:

On September 4, 2025, the Court entered a Scheduling Order, ECF No. 155. On November 19, 2025, the Court held a Case Management Conference. *See* ECF Nos. 182, 184. During the Case Management Conference, the Court and the parties discussed the need to extend the deadline to complete discovery. ECF No. 190-1, at 20-21. The parties have conferred and agree to extend the discovery deadline to March 31, 2025, and to adjust the other deadlines within the scheduling order accordingly. The parties request the Court enter an updated scheduling order to that effect.

REQUESTED RELIEF

Current Scheduling Order Dates	Proposed New Scheduling Order Dates
December 23, 2025 Rule 26(e)(2) supplementation of disclosures and responses	March 9, 2026 Rule 26(e)(2) supplementation of disclosures and responses

January 16, 2026

Completion of Discovery; submission of Post-

Discovery Joint Status Report

January 23, 2026

Requests for admission

January 30, 2025

Notice of Intent to File a Pretrial Dispositive

Motion

March 31, 2026

Completion of Discovery; submission of Post-

Discovery Joint Status Report

April 7, 2026

Requests for admission

April 14, 2026

Notice of Intent to File a Pretrial Dispositive

Motion

CONCLUSION

For the reasons provided herein, the parties ask this Court to grant their Consent Motion for Modification of Scheduling Order.

Respectfully submitted,

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